

Message

From: Holmes, Jean [Holmes.Jean@epa.gov]
Sent: 11/25/2020 5:20:51 PM
To: Corbin, Mark [Corbin.Mark@epa.gov]; Spatz, Dana [Spatz.Dana@epa.gov]; Blankinship, Amy [Blankinship.Amy@epa.gov]; Anderson, Brian [Anderson.Brian@epa.gov]; Sankula, Sujatha [Sankula.Sujatha@epa.gov]; Housenger, Justin [Housenger.Justin@epa.gov]
Subject: RE: incorporation
Attachments: Carboxin_090201+_DP450950_DWA_12-5-2019.pdf

Hi Brian,

Attached is ERB 4's carboxin DWA in which seed treatments using the "linearly increasing with depth" option are modeled.

Jean

From: Corbin, Mark <Corbin.Mark@epa.gov>
Sent: Wednesday, November 25, 2020 12:09 PM
To: Spatz, Dana <Spatz.Dana@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>
Subject: RE: incorporation

Pretty sure Triangle was always an option. Just not used consistently

From: Spatz, Dana <Spatz.Dana@epa.gov>
Sent: Wednesday, November 25, 2020 11:03 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>
Subject: RE: incorporation

Was the triangle used in 2017, or all placed at 2 cm? And what about for the current action?

Dana Spatz | Branch Chief
Environmental Risk Branch 3
Environmental Fate and Effects Division
Office of Pesticide Programs

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, November 25, 2020 11:00 AM
To: Anderson, Brian <Anderson.Brian@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>
Subject: RE: incorporation

Aldicarb reg review mitigation done in 2017 was based on the 2 cm – no runoff assumption.

For the new action the incorporation depth is 2-3".

From: Anderson, Brian <Anderson.Brian@epa.gov>

Sent: Wednesday, November 25, 2020 10:36 AM

To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

Thanks Amy – and the topic is more around going from 0 to not zero below 2 cm – not so much around the shape of the incorporation as I interpreted it.

From: Blankinship, Amy <Blankinship.Amy@epa.gov>

Sent: Wednesday, November 25, 2020 10:35 AM

To: Spatz, Dana <Spatz.Dana@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

The main questions were

Why the change?

What kind of outreach/public engagement did we do?

From: Spatz, Dana <Spatz.Dana@epa.gov>

Sent: Wednesday, November 25, 2020 10:29 AM

To: Corbin, Mark <Corbin.Mark@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

Correct. But what is the AA's question? Is it around the triangle, which was more about acknowledging that it is practically impossible to place all the pesticide at a certain depth, or about the new extraction zone that goes deeper than 2 cm?

What is the aldicarb incorporation depth?

Dana Spatz | Branch Chief

Environmental Risk Branch 3

Environmental Fate and Effects Division

Office of Pesticide Programs

From: Corbin, Mark <Corbin.Mark@epa.gov>

Sent: Wednesday, November 25, 2020 10:27 AM

To: Spatz, Dana <Spatz.Dana@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Anderson, Brian

<Anderson.Brian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

I thought the precursor version had the option to pick the triangle method, but it wasn't the default and not everyone used it?

From: Spatz, Dana <Spatz.Dana@epa.gov>

Sent: Wednesday, November 25, 2020 10:23 AM

To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Anderson, Brian <Anderson.Brian@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

If the question is about using the new extraction zone, that would not have happened until the new version of PWC (2.0?), not by way of the June 2019 guidance. Right?

Dana Spatz | Branch Chief

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Office of Pesticide Programs

From: Blankinship, Amy <Blankinship.Amy@epa.gov>

Sent: Wednesday, November 25, 2020 9:07 AM

To: Anderson, Brian <Anderson.Brian@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

I didn't get a definitive sense of timing. She is having a call with the registrant today and it is a point they have raised (the reg review ID signed in 2017 assumed no runoff, this new action does). So she might ping us today before that call to be honest. But a more complete respond, yes, early next week sounds good.

From: Anderson, Brian <Anderson.Brian@epa.gov>

Sent: Wednesday, November 25, 2020 9:02 AM

To: Corbin, Mark <Corbin.Mark@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>

Subject: RE: incorporation

Alex asked for this when we briefed her on Aldicarb. Amy, did you get a sense of timing?

Maybe by earlyish next week? doesn't have to be exhaustive.

From: Corbin, Mark <Corbin.Mark@epa.gov>
Sent: Wednesday, November 25, 2020 8:46 AM
To: Anderson, Brian <Anderson.Brian@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>
Subject: RE: incorporation

How soon you need this?

From: Anderson, Brian <Anderson.Brian@epa.gov>
Sent: Wednesday, November 25, 2020 8:32 AM
To: Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Spatz, Dana <Spatz.Dana@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>; Corbin, Mark <Corbin.Mark@epa.gov>
Subject: incorporation

Hey Team,

We need a list of drinking water assessments where we used the new PWC, which assumed that you get runoff below 2 cm, for incorporated use patterns (in furrow or whatever).

Can you guys please send me the names of pesticides for any that you can think of off the top of you head? It doesn't need to be exhaustive, but we just need to show that we are assuming that runoff occurs with incorporation routinely.

Thanks

Brian